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10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 UNITED STATES OF AMERICA,)
)
13 Plaintiff,)
)
14 v.) 2:15-CR-122-RFB
)
15 TONY CHAU,)
)
16 Defendant.)

17 **THE UNITED STATES OF AMERICA'S UNOPPOSED MOTION TO EXTEND**
18 **THE TIME FOR THE UNITED STATES TO RESPOND TO THE PETITION FOR**
19 **ADJUDICATION OF INTEREST UNDER 21 U.S.C. § 853 (ECF NO. 30) FILED BY**
RIDGEWOOD SAVINGS BANK, AND ORDER
(First Request)

20 The United States of America respectfully moves this Court for an Order extending the time
21 for the United States to respond to the Petition for Adjudication of Interest Under 21 U.S.C. § 853
22 (ECF No. 30) filed by Ridgewood Savings Bank. The deadline for responding to the Verified Petition
23 is April 10, 2016. The United States requests an extension of time to and including May 11, 2016.

24 The grounds for extending the time are as follows.

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1 V.R. Bohman, counsel for Ridgewood Savings Bank, was contacted on April 7, 2016, and
2 agreed to the extension of time.

3 The AUSA assigned to file the response to the Petition for this case is engaged in settlement
4 negotiations with Attorney Bohman. The negotiations were not completed on time due to the United
5 States Attorney's Office moving locations and there were more complexities involved than
6 anticipated. We anticipate settling the Petition.

7 This Motion is not submitted solely for the purpose of delay or for any other improper
8 purpose.

9 This Court should grant an extension of time to, and including, May 11, 2016, for the United
10 States to respond to the Petition of Ridgewood Savings Bank (ECF No. 30).

11 DATED this 7th day of April, 2016.

12 DANIEL G. BOGDEN
13 United States Attorney

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15 /s/ Daniel D. Hollingsworth
16 DANIEL D. HOLLINGSWORTH
Assistant United States Attorney

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18 IT IS SO ORDERED:

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21 

22 RICHARD F. BOULWARE, II
23 UNITED STATES DISTRICT JUDGE

24 DATED: April 26, 2016

PROOF OF SERVICE

A copy of the foregoing was served upon counsel of record via Electronic Filing on April 7, 2016.

/s/ Heidi L. Skillin
HEIDI L. SKILLIN
Asset Forfeiture Paralegal